IN THE UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:

TRACY NEAL ROBINSON

Debtor

CHAPTER 11 CASE NO. 22-02414-KMS

## **MOTION TO EXPEDITE HEARING**

COMES NOW Tracy Neal Robinson (the "Debtor"), and files this his *Motion to Expedite*Hearing (the "Motion"), and in support thereof, would respectfully show as follows, to-wit:

- 1. On April 21, 2023, the Debtor herein filed with this Court its Voluntary Petition (the "Petition") for bankruptcy under Chapter 11 of the Bankruptcy Code (the "Petition Date").
- 2. The Debtor has filed his Motion for Authority to Sell Real Property Outside the Ordinary Course of Business Free and Clear of Liens, Claims and Interests (the "Motion to Sell") [DK #118] in this case seeking to sell certain real property owned by the Debtor. The Motion to Sell is incorporated herein by reference.
- 3. Debtor would respectfully show unto the Court a situation exists that justifies the Court in expediting the processing and procedures with respect to the Motion to Sell, including, but not limited to, setting an expedited hearing date and objection deadline to consider the Motion to Sell, especially since one sale motion has already been filed.
  - 4. Other grounds to be assigned upon a hearing hereof.

WHEREFORE, PREMISES CONSIDERED, Debtor respectfully prays that upon a hearing hereof, this Honorable Court will enter its order granting the Motion and entering an order expediting the objection deadline and hearing date on the Motion to Sell. Debtor prays for general relief.

THIS, the \_\_\_\_\_day of September, 2023.

Respectfully submitted,

TRACY NEAL ROBINSON

By His Attorneys,

LAW OFFICES OF CRAIG M. GENO, PLLC

By:

Craig M. Gend

## OF COUNSEL:

Craig M. Geno; MSB No. 4793 LAW OFFICES OF CRAIG M. GENO, PLLC 587 Highland Colony Parkway Ridgeland, MS 39157 601-427-0048 - Telephone 601-427-0050 - Facsimile

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## **CERTIFICATE OF SERVICE**

I, Craig M. Geno, do hereby certify that I have caused to be served this date, via electronic filing transmission and/or U. S. Mail, postage prepaid, a true and correct copy of the above and foregoing to the following:

Christopher J. Steiskal, Sr., Esq. Office of the United States Trustee Christopher.j.steiskal@usdoj.gov

Stephen E. Gardner, Esq. steve.gardner@youngwilliams.com

Kimberly D. Strong Subchapter V Trustee <u>kstrong@hrkcpa.com</u>

THIS, the day of September, 2023.

Craig M. Geno